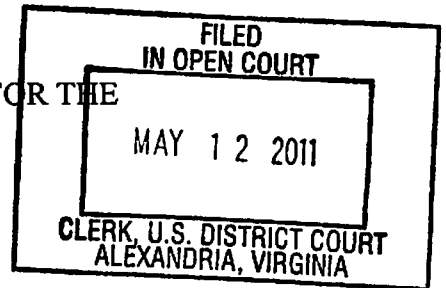


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	Criminal No: 1:11cr217
)	
v.)	Count 1: 18 U.S.C. § 371
)	Conspiracy
JOSE CIRO JUAREZ-SANTAMARIA,)	
)	Count 2: 18 U.S.C. §§ 2423(a) and 2
aka "Sniper,")	Transportation of minor to engage in
)	prostitution
Defendant.)	
)	Count 3: 18 U.S.C. §§ 1591 and 2
)	Sex trafficking a child

INDICTMENT

May 2011 Term - At Alexandria

Count One

(Conspiracy)

THE GRAND JURY CHARGES THAT:

Beginning in and around October 2009, and continuing through in and around December 2009, within the Eastern District of Virginia and elsewhere, the defendant, JOSE CIRO JUAREZ-SANTAMARIA, also known as "Sniper," and an unindicted conspirator did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together and with other persons known and unknown to the grand jury to commit the following offenses:

(1) To knowingly transport an individual, who has not attained the age of eighteen years, in interstate commerce, with intent that the individual engage in prostitution, in violation of 18 U.S.C. § 2423(a); and

(2) To knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, knowing, and in reckless disregard of the fact, that the person had not attained the age of eighteen years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591.

WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY

The primary purpose of the conspiracy was to make money through prostitution. The ways, manner and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that members of the conspiracy recruited a female juvenile to work as a prostitute.
2. It was further part of the conspiracy that one of the members would arrange for clients to have sex with the juvenile for money.
3. It was further part of the conspiracy that members of the conspiracy would transport the juvenile from Maryland to Virginia and elsewhere to engage in prostitution.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendant and his conspirator committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. In and around October 2009, JOSE CIRO JUAREZ-SANTAMARIA recruited a female juvenile, "G.T.," to work as a prostitute.
2. In and around October 2009, JOSE CIRO JUAREZ-SANTAMARIA provided "G.T." with clothes and make up to wear when meeting with prostitution clients.

3. Between in and around October 2009 and in and around December 2009, a member of the conspiracy provided "G.T." with condoms to use when meeting with prostitution clients.

4. Between in and around October 2009 and in and around December 2009, JOSE CIRO JUAREZ-SANTAMARIA and an unindicted conspirator used cellular telephones to arrange for prostitution clients to meet with "G.T."

5. Between in and around October 2009 and in and around December 2009, JOSE CIRO JUAREZ-SANTAMARIA and an unindicted conspirator transported "G.T." by vehicle between the Eastern District of Virginia, the District of Columbia, and Maryland to engage in prostitution.

6. On or about December 19, 2009, JOSE CIRO JUAREZ-SANTAMARIA traveled by car to Washington, D.C. to pick up "G.T." after she met with a prostitution client.

(In violation of Title 18, United States Code, Section 371.)

Count Two

(Interstate Transportation of Minor to Engage in Prostitution)

THE GRAND JURY FURTHER CHARGES THAT:

Between in and around October 2009 and in and around December 2009, in Alexandria, Virginia, in the Eastern District of Virginia, the defendant, JOSE CIRO JUAREZ-SANTAMARIA , also known as "Sniper," and an unindicted conspirator did unlawfully and knowingly transport an individual, namely "G.T.," a female juvenile who was at that time under the age of eighteen years, in interstate commerce from Maryland to Virginia, with intent that "G.T." engage in prostitution and any sexual activity for which any person could be charged with a criminal offense.

(In violation of Title 18, United States Code, Sections 2423(a) and 2.)

Count Three

(Sex Trafficking a Minor)

THE GRAND JURY FURTHER CHARGES THAT:

Between in and around October 2009, and in and around December 2009, in Alexandria, Virginia within the Eastern District of Virginia, and elsewhere, the defendant, JOSE CIRO JUAREZ-SANTAMARIA, also known as "Sniper," did unlawfully and knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely "G.T.," a female juvenile, knowing, and in reckless disregard of the fact, that "G.T." had not attained the age of eighteen years and would be caused to engage in a commercial sex act.

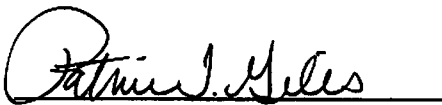
(In violation of Title 18, United States Code, Sections 1591 and 2.)

A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON

Neil H. MacBride
United States Attorney


Patricia T. Giles
Assistant United States Attorney